



July 29, 2020

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Felipe Gonzalez (20-CR-237 (PKC))*

Your Honor:

I represent defendant Mr. Felipe Gonzalez in the above-referenced case and submit this letter to respectfully request the Court's authorization to have my mentee, Christopher Wright, assist me with the instant matter as associate counsel.

I am a Mentor in the Eastern District of New York's Mentoring Program, and Mr. Wright has been assigned as my Mentee in said program. I have been informed that Mentees enrolled in said program are eligible, subject to the presiding judge's approval, to work as Mentees on CJA cases which are pending in the Southern District of New York. As Your Honor may be aware, the Board of Judges of the Southern District of New York has also implemented a Mentoring Program, which assigns experienced members of the District's CJA Panel to act as mentors for attorneys interested in applying to the Panel. The program is intended to improve the diversity and overall quality of the CJA Panel and is open to all interested and qualified attorneys. The Program is designed to provide those attorneys with federal experience by pairing them with mentors and assigning them to cases that the District Court believes are of sufficient complexity to warrant the services of two attorneys. The mentee works under the close supervision of the mentoring attorney and is subject to the approval of the client and the District Judge to whom the case is assigned. The Mentee provides the first 15 hours on a *pro bono* basis, and thereafter may bill at a rate of sixty-five dollars (\$65.00) an hour - a rate, which is commensurate with the hourly rate of a court-appointed paralegal. Mr. Wright has over twenty years of experience practicing criminal law in New York. I believe as associate counsel his appointment will aptly serve Mr. Gonzalez and the goals of the Mentoring Program.

I respectfully submit that Mr. Wright's assistance would be appropriate since there is an extensive amount of discovery in the form of electronic data which requires review. This is a time consuming task and Mr. Wright's assistance with same, at the reduced hourly rate of \$65/hour would provide a cost effective and efficient means of properly representing Mr. Gonzalez.

By way of background, Mr. Gonzalez has been indicted for Narcotics Conspiracy in violation of 18 U.S.C. § 841(a)(1) concerning his alleged involvement in a conspiracy to sell more than one kilogram of Heroin and more than 400 grams of Fentanyl in the Southern District of New York. If

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approved, Mr. Wright would assist with the review and evaluation of the extensive electronic discovery and would otherwise assist in preparing this case for resolution or trial.

If this request meets with Your Honor's approval, I would appreciate if Your Honor would endorse and return the proposed Order by ecf, or email so that I may create CJA Form 21 for Mr. Wright so that he may begin working on the case.

Thank you for your consideration of this request.

Most Respectfully,

A handwritten signature in cursive script that reads "Eric Franz".

ERIC FRANZ